

JAMES SPRIGGS
9727 Mt. Pisgon Road
Silver Spring, Maryland 20903

and

ROBERT A. MORRIS
Route 1, Box 272
Jefferson, Maryland 21755

and

FANNIE M. MORRIS
Route 1, Box 272
Jefferson, Maryland 21755

Respondents

* * *

BILL OF COMPLAINT TO QUIET TITLE

Mary E. Brown by her attorneys, F. Theodore Elliot and ELLIOT, NICKLAS & CASTLE, alleges:

FIRST: The Complainant is owner of all that real estate described in a deed from Gracie E. Jones unto Gracie E. Jones and Mary E. Brown by deed dated the 6th day of August, 1980, and recorded among the Land Records of Frederick County, Maryland in Liber 1122, folio 367. The said Deed is attached hereto as Exhibit A and hereby made a part of this Bill of Complaint.

SECOND: That the Complainant claims as her own certain small areas of additional land adjacent to the property described in said deed, all of which is more particularly described in the survey plat by Snider, Blanchard, Laughland & Tacik, registered land surveyors, attached hereto as Exhibit B and hereby made a part of this Bill of Complaint.

THIRD: The Complainant and her predecessors in title have held legal title to and have been in actual and constructive possession of the said land continuously for a period in excess of twenty (20) years.

FOURTH: That the Complainant presently retains actual and constructive possession of the said land.

FIFTH: That the Respondents are joined as all of the owners and potential owners of the adjoining properties to the north, east and south of the land described herein.

WHEREFORE, your Petitioner prays:

1. That this Court quiet title to the property described in Exhibit B.
2. That this Court declare the title to the said property to be vested, in fee simple, in your Complainant, Mary E. Brown.
3. And for such other and further relief as the nature of this case may require.